BRIAN J. STRETCH (CABN 163973) 1 United States Attorney 2 FILED BARBARA J. VALLIERE (DCBN 439353) 3 Chief, Criminal Division OCT 27 2016 ROBERT S. LEACH (CABN 196191) 4 SUSAN Y. SCONG Assistant United States Attorney CLERK, U.S. DISTRICT COURT 5 NORTHERN DISTRICT OF CALIFORNIA 450 Golden Gate Avenue, Box 36055 San Francisco, California 94102-3495 6 Telephone: (415) 436-7534 Fax: (415) 436-7234 7 Robert.Leach@usdoj.gov 8 Attorneys for United States of America 9 10 UNITED STATES DISTRICT COURT 11 NORTHERN DISTRICT OF CALIFORNIA 12 SAN FRANCISCO DIVISION 13 UNITED STATES OF AMERICA. No. CR-16-116 EMC 14 Plaintiff, UNITED STATES' APPLICATION TO UNSEAL AND [PROPOSED] 15 **ORDER** NEMR HALLAK, TOLGA SUATAC 17 MICHELINA PERNA, a/k/a Michelle Perna, a/k/a Michelle Perry, 18 a/k/a Sonia Perry, and ROBERTO MANCINI. 19 20 Defendants. 21 **APPLICATION** 22 On March 17, 2016, the Court issued a Sealing Order directing the Clerk of the Court to file and 23 maintain under seal the Indictment in this matter dated March 17, 2016 and other documents. On or 24 April 21, 2016, the Court issued a Sealing Order directing the Clerk of the Court to file and maintain 25 under seal the Superseding Indictment in this matter dated April 21, 2016, the Arrest Warrants, and 26 27 other documents, until further order of the Court. The United States is advised that one of the defendants, Nemr Hallak, has been arrested in Greece. By this application, the United States seeks 28

USA's Application to Unseal and [PROPOSED] Order

authority from the Court to submit the Indictment, the Superseding Indictment, and the Arrest Warrant for Hallak on the Superseding Indictment in its extradition request to Greece. The United States also seeks authority from the Court to provide to counsel for Hallak a redacted version of the Superseding Indictment so that counsel may advise Hallak in connection with this matter. The United States requests that the Court's Sealing Orders otherwise remain in effect and that this application be filed under seal to prevent the flight of other defendants in advance of the execution of the Arrest Warrants. Respectfully Submitted, Dated: October 26, 2016 BRIAN J. STRETCH 8 United States Attorney 9 10 11 Assistant United States Attorney 12 [PROPOSED] ORDER 13 Based upon the application of the government and for good cause shown, IT IS HEREBY 14 ORDERED that the United States may submit the Indictment, the Superseding Indictment, and the 15 Arrest Warrant for Hallak on the Superseding Indictment in its extradition request to Greece. The 16 United States also may provide to counsel for Hallak a redacted version of the Superseding Indictment 17 so that counsel may advise Hallak in connection with this matter. The Court's prior Sealing Orders shall 18 otherwise remain in effect. This Order and the United States' application shall be filed under seal. 19 20 IT IS SO ORDERED. 21 22

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Dated: 07 27 20 /6